

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a ) Case No. 16-cv-1054 (WMW/DTS)  
Delaware corporation, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FEDERAL INSURANCE COMPANY, )  
 an Indiana corporation, and ACE )  
 AMERICAN INSURANCE )  
 COMPANY, a Pennsylvania )  
 corporation, )  
 )  
 Defendants. )

**PLAINTIFF FAIR ISAAC CORPORATION'S MOTION TO COMPEL**

Pursuant to Rules 26, 33, 34 and 37 of the Federal Rules of Civil Procedure and Local Rules 7.1 and 37.1, Plaintiff Fair Isaac Corporation (“FICO”) moves to compel Defendant Federal Insurance Company (“Federal”) to comply fully with FICO’s Request for Admission Nos. 13-16 and 20-28. FICO also moves for an award of attorneys’ fees and evidentiary sanctions for Federal’s failure to answer FICO’s Request for Production Nos. 30-32 and 55-70 and Interrogatory Nos. 15-20. This Motion is supported by an accompanying Memorandum of Law to be filed in compliance with Local Rule 7.1, the Declaration of Heather Kliebenstein and Exhibits attached to the Kliebenstein Declaration, the papers and records on file herein, and on such information and evidence as may be presented at any hearing on this Motion.

Dated: November 13, 2018

MERCHANT & GOULD P.C.

/s/Heather Kliebenstein

---

Allen Hinderaker, MN Bar # 45787  
Heather Kliebenstein, MN Bar # 337419  
Michael A. Erbele, MN Bar # 393635  
MERCHANT & GOULD P.C.  
3200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-2215  
Tel: (612) 332-5300  
Fax: (612) 332-9081  
ahinderaker@merchantgould.com  
hkliebenstein@merchantgould.com  
merbele@merchantgould.com

*Attorneys for Plaintiff FICO*